

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MOL GLOBAL, INC. SECURITIES
LITIGATION

No. 14-Civ-9357 (WHP)

ECF Case

**LEAD PLAINTIFF’S NOTICE OF UNOPPOSED MOTION FOR
(I) PRELIMINARY APPROVAL OF SETTLEMENT, (II) CERTIFICATION
OF THE SETTLEMENT CLASS FOR PURPOSES OF THE SETTLEMENT, (III)
APPROVAL OF NOTICE TO THE SETTLEMENT CLASS,
AND (IV) APPOINTMENT OF SETTLEMENT ADMINISTRATOR**

PLEASE TAKE NOTICE that pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Lead Plaintiff Lembaga Tabung Amanah Pekerja (“Lead Plaintiff”), on behalf of the proposed settlement class, respectfully moves this Court for an order that, among other things: (i) preliminarily approves a settlement of this action; (ii) preliminarily certifies a class for settlement purposes; (iii) approves the form and manner of notice of the proposed settlement to the members of the settlement class; (iv) appoints a settlement administrator; and (v) grants such other and further relief as the Courts deems just and proper.

In addition to all prior pleadings and proceedings had herein, Lead Plaintiff also submits the following documents in support of Lead Plaintiff’s motion: (1) Memorandum of Law in Support of Unopposed Motion for (i) Preliminary Approval of Settlement, (ii) Certification of the Settlement Class for Purposes of the Settlement, (iii) Approval of Notice to the Settlement Class, and (iv) Appointment of Settlement Administrator; (2) Declaration of Daniel Hume and exhibits attached thereto, including the Stipulation of Settlement dated April 11, 2016 with exhibits attached thereto (annexed as Exhibit 1) (the “Stipulation”); and (3) a proposed

Preliminary Approval Order (“Proposed Order”). The Proposed Order is attached as Exhibit A to the Stipulation and is concurrently being submitted to the Court herewith.

Dated: April 12, 2016

Respectfully Submitted,

KIRBY McINERNEY LLP

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